

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

Magistrate Judge Paula L. McCandlis

DEC 07 2018

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

V.

MATTHEW M. WITTERS.

Defendant.

NO. MJ 18-501

COMPLAINT FOR VIOLATION

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), 846

10. *Journal of the American Statistical Association*, 1980, 75, 369-383.

BEFORE, Paula E. McCandless

BEFORE, Paula L. McCandlis, United States Magistrate Judge, U. S. Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, but within the last five years, and ending on or about November 26, 2017, in Seattle, within the Western District of Washington, and elsewhere, MATTHEW M. WITTERS, and others known and unknown, knowingly and intentionally did conspire to distribute controlled substances under Title 21, United States Code, Section 812, including fentanyl and alprazolam.

It is further alleged that the offense involved 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-

1 piperidinyl] propanamide and 100 grams or more of a mixture or substance containing a
2 detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
3 propanamide.

4 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
5 and 846.

6 The undersigned complainant, Michael Fischlin, a Postal Inspector with the United
7 States Postal Inspection Service (“USPIS”) being duly sworn, further deposes and states
8 as follows:

9 **INTRODUCTION**

10 1. I am a Postal Inspector with the USPIS and have been so employed since
11 June 2016. I am currently assigned to the Seattle Division, Prohibited Mail Narcotics
12 Team, where I investigate controlled substances transported via the United States Mail. I
13 have attended a one-week training course presented by the USPIS addressing narcotics
14 investigations and trends in narcotics mailings. At that training, subject matter experts
15 taught current trafficking trends and suspicious parcel recognition.

16 2. Prior to becoming a Postal Inspector, I was employed as a Special Agent
17 (“SA”) of the United States Secret Service (“USSS”). As part of my training, I
18 completed the Federal Law Enforcement Training Center (“FLETC”) Criminal
19 Investigator Training Program as well as the USSS SA Training Program. While
20 employed by the USSS, I was trained in computer forensics. Prior to joining the USSS, I
21 served four years of active duty in the United States Marine Corps as a military
22 policeman.

23 3. As a Postal Inspector, I am authorized to investigate crimes involving
24 federal offenses relating to the United States Postal Service (“USPS”). During the course
25 of my law enforcement career, I have conducted or participated in criminal investigations
26 involving access device fraud, bank fraud, computer fraud, counterfeit currency and
27 securities, identity theft, illegal narcotics, mail theft, robbery, and wire fraud. My duties
28

1 have included planning the execution of search warrants; securing and searching
2 premises; seizing documents, records and other evidence; and interviewing witnesses.

3 4. The facts set forth in this complaint are based on my own personal
4 knowledge; information obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; interviews of cooperating
6 witnesses; review of documents and records related to this investigation; communications
7 with others who have personal knowledge of the events and circumstances described
8 herein; and information gained through my training and experience.

9 5. Because this affidavit is submitted for the limited purpose of establishing
10 probable cause in support of a criminal complaint, it does not set forth each and every
11 fact that I, or others, have learned during the course of this investigation.

12 6. As discussed below, MATTHEW WITTERS both purchased and sold
13 drugs on dark web marketplaces under the handles “kakashisan” and
14 “sayNOtoCUSTOMS”, which were shipped via the USPS. WITTERS completed
15 approximately 2,938 orders on the dark web under the listed monikers for approximately
16 1,271 bitcoin, valued at approximately \$764,588 at the time of sales.

SUMMARY OF PROBABLE CAUSE

A. The Dark Web

19 7. The Onion Router or “TOR” network is a special network of computers on
20 the Internet, distributed around the world, that is designed to conceal the true Internet
21 Protocol (“IP”) addresses of the computers accessing the network, and thereby the
22 locations and identities of the network’s users. TOR likewise enables websites to operate
23 on the network in a way that conceals the true IP addresses of the computer servers
24 hosting the websites, which are referred to as “hidden services” on the TOR network.
25 Such “hidden services” operating on TOR have complex web addresses, which are many
26 times generated by a computer algorithm, ending in “.onion” and can only be accessed
27 through specific web browser software designed to access the TOR network. Most
28

1 "hidden services" are considered dark web services with no legitimate or identified
2 service provider to which legal process may be served.

3 8. There are a number of marketplaces that have appeared on the dark web
4 that have offered contraband for sale, including narcotics. Users typically purchase
5 narcotics through these marketplaces using digital currency such as bitcoin.

6 9. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a
7 public ledger that is maintained by peer-to-peer verification and is thus not maintained by
8 a single administrator or entity. Bitcoins are widely used to conduct both legitimate and
9 unlawful business. For example, Microsoft accepts bitcoins as payment for Xbox games
10 and services. On the other hand, bitcoins were the payment used on the Silk Road, a
11 website on the dark web that offered drugs and other contraband for sale.

12 10. Pretty Good Privacy ("PGP") is used on dark web markets to encrypt
13 communications between vendors and customers. When a customer orders from a
14 vendor or sends a vendor a message on a dark web market, that information may be
15 stored in the marketplace's database. Given concerns that the marketplace server may be
16 hacked or seized by law enforcement, vendors and customers often communicate via
17 PGP encrypted means to address this security problem.

18 11. A vendor has both a PGP private key and a public key. A customer can use
19 the vendor's public key to encrypt a message. The vendor then uses their private key to
20 decrypt the message. Vendors keep their private key secure but not their public key,
21 which they put on their profile. This is done so customers may use a vendor's PGP
22 public key to encrypt data sent to the vendor, such as the customer's name and address.
23 Only the corresponding PGP private key, held by the vendor, can decrypt the data.

24 **B. The Seized Packages**

25 10. During the investigation, law enforcement seized multiple packages of
26 drugs that were destined for WITTERS.

27 11. Specifically, on or about November 20, 2017, I intercepted an international
28 parcel at the Shoreline Post office. The parcel was from China and addressed to

1 WITTERS at 16738 2nd Ave NE, Shoreline, WA. A Homeland Security Investigations
 2 ("HSI") SA conducted an extended border search of the parcel. The parcel contained
 3 small plastic baggies with a white powder and a rock-like substance. The substances
 4 found within the parcel were sent to the Washington State Patrol ("WSP") Crime
 5 Laboratory for analysis. On November 27, 2018, the WSP Crime Laboratory provided
 6 results. Based upon gas chromatography/mass spectrometry and infrared spectroscopy, a
 7 WSP Crime Laboratory forensic scientist concluded that one of the baggies containing
 8 five grams of white powder contained fentanyl. USPS business records showed that a
 9 phone number associated with WITTERS had tracked the parcel.

10 12. On or about November 20, 2017, U.S. Customs and Border Protection
 11 ("CBP") in San Francisco, California, had seized an international parcel from China
 12 addressed to WITTERS at the same Shoreline address. The package contained a variety
 13 of substances, including approximately five grams of a substance that was presumptively
 14 identified as fentanyl hydrochloride. Fentanyl hydrochloride is the hydrochloride salt
 15 form of fentanyl.

16 13. Previously, on or about September 9, 2017, CBP in Torrance, California,
 17 had seized an international parcel from Tonga addressed to WITTERS at the same
 18 Shoreline address. The package contained a variety of substances, including
 19 approximately six grams of a substance that was presumptively identified as
 20 benzylfentanyl. Benzylfentanyl is a fentanyl analog.

21 **C. WITTERS's Orders on the Dark Web**

22 14. In April 2017, federal agents executed a search warrant for a residence in
 23 Oklahoma. The residence was associated with a dark web vendor who operated on
 24 AlphaBay who shipped controlled substances, including fentanyl, via the USPS. Agents
 25 seized drugs from the residence, including fentanyl. In addition, a spiral notebook was
 26 found inside of a backpack within the residence. One of the pages within the notebook
 27 contained a label bearing the name "Matt Witters" and the address "2104 SW 110th St,
 28 Seattle, WA 98146." On the same page, the word "saynotocustoms" was handwritten.

1 Using a law enforcement database, I found that WITTERS was associated with this street
2 address.

3 15. In December 2017, I learned of a USPIS case in California that involved a
4 suspect in Seattle. Specifically, in August 2017, S.G. was charged in the Southern
5 District of California with Conspiracy to Distribute Fentanyl, Possession with Intent to
6 Distribute Carfentanil, and Possession with Intent to Distribute Ketamine. Pursuant to a
7 search warrant served on S.G.'s computers and investigation into S.G.'s dark web
8 identities, it was determined that S.G. had operated on numerous dark web marketplaces,
9 including AlphaBay. The investigation revealed that S.G. had completed thousands of
10 transactions on the dark web where S.G. had bought and sold controlled substances
11 throughout the United States. The investigation also revealed that S.G. imported
12 narcotics into the United States.

13 16. A sales ledger was found on S.G.'s computer with entries listing the type
14 and amount of drug sold, the buyer's dark web marketplace moniker, and the name and
15 address of where the package was sent. Two of the entries included WITTERS's name:

16 DEC 21

17 Matt Witters – 1 K – sayNotoCustoms – Ab
18 7905 Detroit Ave. SW
19 Seattle, WA 98106-1906

20 JUN 17

21 Matt Witters – 2 K – sayNotoCustoms
22 2104 SW 110th St.
23 Seattle, WA 98146

24 17. Using a law enforcement database, I found that WITTERS was associated
25 with both of these street addresses. S.G. told law enforcement agents that "K" on the
26 ledger referred to Ketamine. Ketamine is a Schedule III controlled substance.

27 **D. sayNotoCUSTOMS's Dream Market Profile**

28 18. As discussed above, the phrase "saynotocustoms" was found on the spiral
notebook in S.G.'s residence. On or about August 22, 2017, USPIS Inspector Brett

1 Willyerd and I located the vendor profile for "sayNOtoCUSTOMS" on Dream Market, a
 2 dark web marketplace.¹ The profile picture for sayNOtoCUSTOMS was of Homer
 3 Simpson wearing a reggae hat and glasses. At that time, sayNOtoCUSTOMS was in
 4 "vacation mode," meaning that sayNOtoCUSTOMS was not actively taking new orders
 5 for narcotics via Dream Market. However, Dream Market showed that
 6 sayNOtoCUSTOMS's last active date was on or about August 22, 2017, meaning that
 7 someone had logged into the account on that day.

8 19. On or about October 6, 2017, I viewed sayNOtoCUSTOMS's profile on
 9 Dream Market. sayNOtoCUSTOMS was no longer in vacation mode. The following
 10 comment was under the terms and conditions of sayNOtoCUSTOMS's profile:

11 BACK from vacation. If my listings are up I am working and
 12 you will get it in timely manner, you never have to ask. I
 13 ALWAYS take my listings down when I'm not gonna be
 14 working. If you've ordered and haven't received it and I take
 15 my listings down and put my status on vacation rest assured
 16 your stuff is coming.

17 20. I observed that sayNOtoCUSTOMS had three separate listings for fentanyl,
 18 varying from 500 milligrams to 3 grams. sayNOtoCUSTOMS indicated that orders of
 19 500 milligrams and under would be shipped via first-class mail. I reviewed a listing for 1
 20 gram of fentanyl and observed that the only shipping option was priority mail. I also
 21 observed a comment under the terms and conditions of sayNOtoCUSTOMS's profile
 22 regarding the need for customers to use Kleopatra. Kleopatra is an application used to
 23 store PGP certificates and keys.

24 21. On or about November 8, 2017, I viewed sayNOtoCUSTOMS's profile on
 25 Dream Market. I observed four separate listings for fentanyl, varying from 250
 26 milligrams to 3 grams. Under the terms and conditions section of the profile, I observed

27 27
 28 1 The moniker "sayNOtoCUSTOMS" appeared on multiple dark web sites and in various other places,
 often with different letters capitalized. For ease of reference, this Affidavit uses a single form of
 capitalization of the moniker.

1 the following: "UPDATE 11/2: I'm not retiring afterall... I had a massive loss of money
2 so I need to work still... despite the major risks. I'm trying to find a partner to ship for
3 me but rn im doing it." I also noticed another update: "UPDATE 10/27: I had some life
4 situation pop up this week that required my full attention ad a few packs went out late.
5 You guys know for 3 yrs I've been the fastest guy anywhere, but life happens, There
6 might be a 3-4 day delay for a few of your orders this week. sorry guys, remember I'm
7 not amazon."

8 22. On or about November 15, 2017, I viewed sayNOtoCUSTOMS's profile on
9 Dream Market. I observed nine separate listings for fentanyl, six of which were for nasal
10 sprays. A 500 milligram fentanyl listing by sayNOtoCUSTOMS contained the following
11 under the shipping and refunds section of the product description:

12 So due to security and shipping concerns (the bulk of orders
13 are under 500mg, and having giant bags of parcels is a red
14 flag), everything up to 500mg will be shipping using first
15 class mail now, 1g and up will go priority with tracking, first
16 class mail letters will be UNTRACKED and you agree that if
17 your order is lost there will be NO RESHIPS on any orders
18 up to 500mg, this is just the chance you gotta take if you
19 wanna order from me. I haven't had a parcel be lost in a long
time, as long as the address you give me is correct and valid.
If your order is 500mg and below make sure you are able to
get your mail daily and check for your letter.

20 23. In addition, under sayNOtoCUSTOMS's listings for fentanyl spray there
21 was a product description, which included: "I sold thousands of these on Alphabay. You
22 can carry them around anywhere you go and take your meds when and where you need
23 them, anyone looking thinks you just have allergies! I've literally done sprays RIGHT
24 next to a cop in line at the grocery store. Who would know? no one."

25 24. In addition to the fentanyl listings, there was a listing titled "REAL
26 ALPLAX 2MG BARS BY GADOR PHARMA!" The listing included a photograph of
27 numerous white strips of tablets laid on a black surface. Alplax is also know by the brand
28

1 name Xanax, and contains the drug alprazolam, which is a Schedule IV controlled
2 substance.

3 25. On or about November 17, 2017, I accessed Dream Market. I was unable
4 to find any listings by sayNOtoCUSTOMS.

5 26. On or about February 2, 2018, I logged into Dream Market and viewed
6 sayNOtoCUSTOMS's profile. Dream Market showed that sayNOtoCUSTOMS had
7 retired on November 26, 2017. Under the terms and conditions section of the profile, I
8 observed the following: "11/17; On vacation sorry guys don't know for how long, could
9 be a long time. all orders went out that were accepted, one i accepted and then rejected.
10 Sorry guys, it is what it is."

11 27. Dream Market showed that sayNOtoCUSTOMS joined on November 13,
12 2015. sayNOtoCUSTOMS had 340 reviews with an overall rating of 4.92 out of 5. Due
13 to my experience, I know that a review is generally associated with an order, meaning
14 that sayNOtoCUSTOMS had conducted at least 340 orders on Dream Market. During
15 my reviews of the account, I observed that sayNOtoCUSTOMS had sold both fentanyl
16 and Xanax. Fentanyl was sold in the form of both a powder and a nasal spray.

17 **E. sayNOtoCUSTOMS's Profile on AlphaBay**

18 28. sayNOtoCUSTOMS also operated on AlphaBay, which, as described
19 above, was a dark web marketplace that was seized by law enforcement in July 2017. I
20 reviewed records from the seized AlphaBay server, which contained information about
21 the vendor account for sayNOtoCUSTOMS. The profile picture for the account was of
22 Homer Simpson wearing a reggae hat and glasses, which matched the profile picture for
23 sayNOtoCUSTOMS on Dream Market.

24 29. The sayNOtoCUSTOMS profile included an "about" section which began:
25 "I'm a real fentanyl HCL vendor (pure 98% fully water soluble salts), not the bullshit
26 analogs." Records showed that sayNOtoCUSTOMS sold fentanyl and Xanax on the
27 marketplace. Fentanyl was sold in the form of both a powder and a nasal spray.

1 30. A review of the AlphaBay records revealed a listing by
2 sayNOtoCUSTOMS titled “800 REAL ALPLAX BRAND BARS BY GADOR
3 PHARMACEUTICAL – USA.” The listing included a photograph of numerous white
4 strips of tablets laid on a black surface. The photograph matched the photograph for a
5 similar listing by sayNOtoCUSTOMS on Dream Market, providing further evidence that
6 sayNOtoCUSTOMS was controlled by the same user on both Dream Market and
7 AlphaBay.

8 31. Records showed that sayNOtoCUSTOMS registered on AlphaBay on or
9 about November 8, 2015. sayNOtoCUSTOMS was last active on the site on or about
10 July 5, 2017. sayNOtoCUSTOMS completed approximately 2,383 orders. Records
11 indicated that, from around November 2015 to July 2017, sayNOtoCUSTOMS received
12 approximately 1,165 bitcoins as payment for the orders.

13 32. Records further showed that sayNOtoCUSTOMS posted a message on
14 AlphaBay Market Forum regarding the use of a mixer to anonymize coins withdrawn
15 from AlphaBay. The message included the following:

16 Thats great, so I have been using bitblender² for my blending.
17 has anyone checked how effective AB’s tumbling is? I’m not
18 hip enough to figure out if w/d’s strait from AB are fully
19 untraceable or is it possible to see the coins came from AB
20 unless you tumble them a second time? i think .5% is more
21 than fair for simple computer operation. So I’m a level 6
22 vendor with 3k a day in sales. should I tumble them still or
23 should I be safe with AB’s new tech?

24 **F. Related Vendor Account on AlphaBay**

25 33. As discussed below, the vendor account “kakashisan” on AlphaBay
26 appeared to be controlled by the same user as sayNOtoCUSTOMS.
27

28 ² Based upon my training and experience, I know that Bitcoin Blender is a Tor hidden service that allows
users to obfuscate their Bitcoin transactions.

1 34. I reviewed the seized AlphaBay server for records pertaining to kakashisan.
2 The records showed that kakashisan registered on AlphaBay on or about September 20,
3 2015. kakashisan was last active on the site on or about July 1, 2017. kakashisan
4 completed approximately 215 orders for approximately 106 bitcoins. kakashisan sold
5 fentanyl and Xanax on the marketplace. Fentanyl was sold in the form of both a powder
6 and a nasal spray.

7 35. Records showed kakashisan posted a message on the AlphaBay Market
8 Forum claiming to reside in Seattle. On November 1, 2015, kakashisan also posted a
9 message advising that he had created a new account under the name sayNotoCUSTOMS
10 which read:

11 I finally got my hands on a few hundred real Alplax bbrand
12 bars by Gador pharmaceuticals (I always put alprax cause i
13 buy those too sometimes from an indian seller and i get the
14 names mixed up lol, these are alplax bars by gador), they are
15 hands down the best quality xanax bar on the planet. Don't
16 believe me? google it. I'm 100% sure I'm the only human on
17 early selling these us to us on any market.
18 enjoy :) i only got 400 of them but they are worth every
19 penny, the champagne of bars lol.

20 I've made a new account and will be listing them on Sunday
21 11/7 under the account sayNotoCUSTOMS

22 36. A message from the AlphaBay server that was sent by sayNotoCUSTOMS
23 on November 18, 2015, further indicated that sayNotoCUSTOMS and kakashisan were
24 controlled by the same person. The message was titled, "Whoops! This is kakashisan!"
25 and included the following: "I forgot to tell you that I made this account for my vending
26 now I started vending on kakashisan and decided it was smarter to have a separate vend
27 account."

28 37. In another message that was part of the same exchange,
29 sayNotoCUSTOMS wrote:

30 please I've given plenty of proof this is my account, look at
31 my post in november that says "This is kakashisan!" cause
32 people were getting confused, please guys i've been of or

your top vendors for a long time almost 600k in sales please
you KNOW it's me. Its my commission account. I'm a good
vendor people really like me can you please just do this one
favor for me?

G. WITTERS's Ties to sayNOtoCUSTOMS and kakashisan

38. During my investigation, I uncovered numerous pieces of evidence tying WITTERS to the sayNOtoCUSTOMS and kakashisan accounts. First, according to the seized AlphaBay records, the date of birth associated with the sayNOtoCUSTOMS and kakashisan profiles matched WITTERS's date of birth.

39. Second, as detailed above, S.G.'s drug ledger indicated that sayNOtoCUSTOMS was WITTERS.

40. Third, USPS business records showed several USPS accounts in WITTERS's name. One of the accounts listed an address of 7905 Detroit Ave SW, Seattle, WA. The account had a user name of "kakashisan." It should be noted the address for this account matched one of the addresses for WITTERS listed on S.G.'s drug ledger.

41. Fourth, the email address associated with sayNOtoCUSTOMS on Dream Market was anon432112344321@gmail.com. I obtained a search warrant for this account and it contained several emails indicating that WITTERS had control over the email account. For example, I located an email sent on February 18, 2016, regarding an order for Alprax in which MoneyGram was used for payment that included the following message:

Hey bud I just sent moneygram for \$660 for 100 viagra and 1000 alprax. \$150 for the viagra and \$500 for the alprax and \$10 shipping.

Sent to: USARAK PUTTAWONG

Senders name: MATTHEW WITTERS

Senders City: Seattle, WASHINGTON, USA

1 42. I located another email sent by anon432112344321@gmail.com on April
 2 15, 2016, in which the user provided a name and address for shipment. The name and
 3 address provided was Matt WITTERS, 7905 Detroit Ave SW, Seattle, WA 98106.

4 43. Fifth, I also located in this email account a message in which the user
 5 shared the PGP public key for kakashisan and otherwise referred to that vendor name and
 6 sayNOtoCUSTOMS. Specifically, the message, send on November 9, 2015, stated:

7 here is kakashisan's pgp again. I have a new vendor account
 8 on alphabay called "sayNOtoCUSTOMS" I'll give you that
 9 pgp too. please import both pgp certificates to your pgp.
 10 Kakshisan PGP, this is for SURE the same pgp as i used on
 11 abraxas [i.e., a different dark net drug market].

12 44. In addition, I located in the email account a message containing the PGP
 13 public key for sayNOtoCUSTOMS. The message stated: "new PGP for my vendor
 14 account called sayNOtoCUSTOMS." I also located in the email account a message
 15 addressed to the user of the account that began, "Hi saynotocustoms".

16 45. Sixth, I obtained an email search warrant for a different email account
 17 associated with WITTERS, cssrules@gmail.com, which contained additional evidence.
 18 For example, I recovered an email with an attached photograph of WITTERS holding his
 19 driver's license and a piece of paper that said, "cryptsy - 11/24/2015" under which
 20 "kakashisan" was written. I also located an email with an attached photograph of
 21 numerous white strips of tablets laid on a black surface. The photograph matched the
 22 photograph for the sayNOtoCUSTOMS Alplax listings on both AlphaBay and Dream
 23 Market. I also located an email sent by cssrules@gmail.com attached to which were the
 24 PGP private and public keys for kakashisan. The public PGP key matched the public
 25 PGP key found on the seized AlphaBay server for the vendor kakashisan. I also located
 26 numerous emails pertaining to orders for equipment and supplies that could be used in the
 27 distribution of controlled substances via the U.S. mail. The orders included such items as
 28 digital scales, heat/vacuum sealers, Mylar bags, plastic baggies, nasal spray bottles,
 bottles with droppers, printer ink cartridges, and mailing/shipping labels. In addition,

1 numerous emails were located pertaining to USPS orders shipped to WITTERS for large
 2 quantities of priority mail boxes, priority mail envelopes, address labels, tracking labels,
 3 and stamps.

4 46. Seventh, WITTERS is closely associated with Bitcoin, a cryptocurrency
 5 used to conduct drug sales on Dream Market and AlphaBay. For example, WITTERS's
 6 Facebook account included a post responding to a post that showed a picture of cash.
 7 WITTERS posted:

8 That looks like 25k. I win lol, nah, cash is for suckers, buy
 9 bitcoin man. Cash aint gonna be worth the paper it's printed
 10 on soon. I wish I could buy a house with bitcoin but one day
 11 you will be able to. crypto is gonna get us out from under the
 12 banksters thumbs and we will truly be free. The age of
 13 information will bring about the age of empire.

14 47. Eighth, WITTERS on his Facebook page described losing a large amount
 15 of bitcoins, coinciding with the time that sayNOtoCUSTOMS went dark on Dream
 16 Market, explaining why he was no longer active on the dark web site. Specifically,
 17 WITTERS posted on Facebook on November 17, 2017:

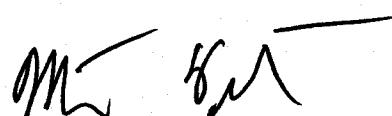
18 if you guys would have bought bitcoin in september when it
 19 crashed to 3kk cause china banned it (for the third time, they
 20 will be unbanning it again here soon). btc hit 8k 3 times in
 21 the last few days. I told you guys at \$400, \$650, \$800, etc, I
 22 have the FB posts right here lol, you guys cant say you didn't
 23 know. had a super bad week i got phished like an udiot and
 24 lost 600k bitcoin, almost offed myself, then I remembered I
 25 had 114 coins in an old blockchain wallet i forgot the pw to in
 26 may 2016, i pestered blockchain.com, a company that offers
 27 wallets, they had told me that if I lost my recovery phrase and
 28 had second pw I was SOL, but i was looking around about it
 online and fiund a post a guy nade of an email from
 blockchain with an attachment of all his wallet backups, I was
 like wtf, why shouldn't I be able to get my old wallet backup
 emaild to me. They did it after pestering them for 2 days lol,
 It was hard too I hade to figure out how top get my private
 keys from the wallet it was nuts for days I sat here in the
 hopes this would work and last night I did it I got 114 bitcoins

1 woth about 850k lol, sucks I got hacked but i proly never
2 would have gotten that wallet back if I wasn't desperate lol.

3 48. As noted above, sayNOtoCUSTOMS left Dream Market on or about
4 November 26, 2017, posting on November 17, 2017, the day of the Facebook post above:
5 "11/17; On vacation sorry guys don't know for how long, could be a long time. all orders
6 went out that were accepted, one i accepted and then rejected. Sorry guys, it is what it is."

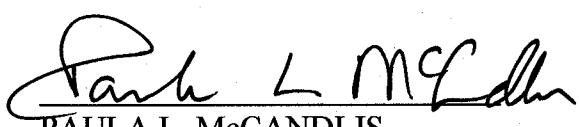
7 **CONCLUSION**

8 49. Based on the foregoing, I respectfully submit that there is probable cause to
9 believe that WITTERS committed the crime of Conspiracy to Distribute Controlled
10 Substances, in violation of 21, United States Code, Sections 841(a)(1), (b)(1)(A), and
11 846.

12 
13 MICHAEL FISCHLIN, Complainant
14 Inspector, USPIS

15 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
16 presence, the Court hereby finds that there is probable cause to believe the Defendant
17 committed the offense set forth in the Complaint.

18
19 Dated this 7th day of December, 2018.
20

21 
22 PAULA L. McCANDLIS
23 United States Magistrate Judge
24
25
26
27
28